

EXHIBIT 150

PUBLIC

1
2 UNITED STATES DISTRICT COURT
3 EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

4 UNITED STATES, et al.,

5 Plaintiffs,

6 -against-

7 GOOGLE LLC,

8 Defendant.

9 No: 1:23-cv-00108-LMB-JFA

10
11 September 28, 2023

12 10:04 a.m.

13
14
15
16 DEPOSITION of SIMON WHITCOMBE,
17 taken by Defendant, pursuant to Notice,
18 held at the offices of COVINGTON & BURLING
19 LLP, 620 Eighth Avenue, New York, New York
20 before Wayne Hock, a Notary Public of the
21 State of New York.

22
23
24
25 Job No. CS6114685

<p style="text-align: right;">Page 14</p> <p>1 S. Whitcombe</p> <p>2 traditional advertisers, so much smaller</p> <p>3 retailers would fall into that. I'm</p> <p>4 trying to think of a good example of a</p> <p>5 retailer we have in mid-market right now.</p> <p>6 I think in the travel category, it would</p> <p>7 be smaller airlines, like a Jet Blue.</p> <p>8 Q. And this one may be hard, but do</p> <p>9 you have an example of a small business</p> <p>10 advertiser customer of Meta?</p> <p>11 A. Yeah.</p> <p>12 This would be seed round</p> <p>13 consumer-focused companies generally. It</p> <p>14 would be a lot of mom-and-pop businesses.</p> <p>15 So anything from a very local business,</p> <p>16 yeah, those type of businesses.</p> <p>17 Q. Okay. Thank you.</p> <p>18 Mr. Whitcombe, do you understand</p> <p>19 that you're here today to provide</p> <p>20 testimony as a corporate representative of</p> <p>21 Meta Platforms, Inc. regarding topics</p> <p>22 related to Meta's ads business?</p> <p>23 A. Yes.</p> <p>24 Q. Can you please describe Meta</p> <p>25 Platforms' advertising business generally?</p>	<p style="text-align: right;">Page 16</p> <p>1 S. Whitcombe</p> <p>2 and services there?</p> <p>3 A. So our brands, so Facebook,</p> <p>4 Instagram are great examples, are</p> <p>5 available as mobile apps but they are also</p> <p>6 available on the open web.</p> <p>7 Q. Okay.</p> <p>8 And when you say "the open web",</p> <p>9 what do you mean by that?</p> <p>10 A. The mobile web or however people</p> <p>11 are accessing the Internet through a</p> <p>12 browser.</p> <p>13 Q. Okay.</p> <p>14 Any other apps and services</p> <p>15 beyond Facebook and Instagram that you</p> <p>16 have in mind?</p> <p>17 A. I mean, our core advertising</p> <p>18 proposition is focused today, at least in</p> <p>19 North America, around Facebook and</p> <p>20 Instagram. But we also have WhatsApp and</p> <p>21 Messenger.</p> <p>22 Q. And does Meta sell advertising</p> <p>23 space on Messenger?</p> <p>24 A. We sell -- today we sell what we</p> <p>25 call click to messaging ads, which if a</p>
<p style="text-align: right;">Page 15</p> <p>1 S. Whitcombe</p> <p>2 A. Sure.</p> <p>3 I think our value proposition --</p> <p>4 the value proposition that we take to</p> <p>5 market; would that answer the question?</p> <p>6 Q. Yeah, sure. Let's start there.</p> <p>7 A. So I think the value proposition</p> <p>8 is -- is the reach, engagement we have</p> <p>9 across our various apps and services and</p> <p>10 the products or the advertising products</p> <p>11 and features that we bring to market for</p> <p>12 advertisers is pretty extensive. I would</p> <p>13 say the formats and services that we offer</p> <p>14 those products on. I would say the</p> <p>15 performance that we're able to drive</p> <p>16 competitively in the marketplace. And</p> <p>17 then I would say the measurement tools</p> <p>18 that allow advertisers to understand the</p> <p>19 efficacy of the advertising that they</p> <p>20 invest with us.</p> <p>21 Q. I think you mentioned apps in</p> <p>22 your -- you said the reach, engagement we</p> <p>23 have across our various apps and services.</p> <p>24 What do you mean by -- what are</p> <p>25 you thinking of when you mentioned apps</p>	<p style="text-align: right;">Page 17</p> <p>1 S. Whitcombe</p> <p>2 person clicks on those ads from one of our</p> <p>3 apps or services like a Facebook or</p> <p>4 Instagram, rather than driving to a web</p> <p>5 page or into a mobile app, it will open up</p> <p>6 a message thread on WhatsApp or Messenger.</p> <p>7 Q. Does Meta sell any advertising</p> <p>8 space on WhatsApp?</p> <p>9 A. Not advertising space per se,</p> <p>10 no.</p> <p>11 Q. You also mentioned in your</p> <p>12 answer formats and services.</p> <p>13 Do you recall that?</p> <p>14 A. Yes.</p> <p>15 Q. What were you referring to when</p> <p>16 you mentioned formats and services?</p> <p>17 A. Well, there are different types</p> <p>18 of ad solutions that we have, different</p> <p>19 formats of ads. So within a news feed</p> <p>20 environment, for instance, in a Facebook</p> <p>21 or an Instagram news feed, we would have</p> <p>22 the availability of video ads within that</p> <p>23 format. We would have what we would call</p> <p>24 dynamic ads as examples within that</p> <p>25 format, which is a product catalog-based</p>

<p style="text-align: right;">Page 18</p> <p>1 S. Whitcombe</p> <p>2 solution. I think those are solutions of</p> <p>3 different formats.</p> <p>4 And then different services</p> <p>5 would be Facebook as a service, Instagram</p> <p>6 as a service, and -- yeah, so on and so</p> <p>7 forth.</p> <p>8 Q. And you mentioned I think video</p> <p>9 ads and dynamic ads as examples of ad</p> <p>10 formats that Meta offers advertisers on</p> <p>11 its services.</p> <p>12 What other ad formats does Meta</p> <p>13 offer to its advertiser customers on its</p> <p>14 services?</p> <p>15 A. We have an extensive amount of</p> <p>16 formats and tools that we make available.</p> <p>17 I'm not sure I could represent all of them</p> <p>18 here today because we have a lot of</p> <p>19 products, a lot of -- a lot of products</p> <p>20 and formats. But we would have static --</p> <p>21 static ads, ads that are just a single</p> <p>22 image that would drive through to a</p> <p>23 website. We would have ads available in</p> <p>24 stories as a format. We would have ads</p> <p>25 available -- so we have dynamic ads, we</p>	<p style="text-align: right;">Page 20</p> <p>1 S. Whitcombe</p> <p>2 not clear on exactly what "native ads"</p> <p>3 would mean as a definition. I'm assuming</p> <p>4 that these would be ads that would be</p> <p>5 native to the platform or the app, is my</p> <p>6 guess. Again, I'm not clear on the</p> <p>7 definition of "native ads".</p> <p>8 Q. Yeah, me neither, but I figured</p> <p>9 I'd ask you.</p> <p>10 With that interpretation, does</p> <p>11 Meta offer customers native ads on its --</p> <p>12 A. I've never spoken to an</p> <p>13 advertiser about native ads, nor would I</p> <p>14 really understand necessarily what that</p> <p>15 means.</p> <p>16 Q. Have you ever heard of the term</p> <p>17 "owned and operated properties"?</p> <p>18 A. I have heard the term "owned and</p> <p>19 operated properties", yeah.</p> <p>20 Q. What's your understanding of</p> <p>21 that term?</p> <p>22 A. My assumption is owned and</p> <p>23 operated properties would be -- in an</p> <p>24 advertising context?</p> <p>25 Q. Yes.</p>
<p style="text-align: right;">Page 19</p> <p>1 S. Whitcombe</p> <p>2 have collection ads that, rather than</p> <p>3 having individual products, they would be</p> <p>4 collections of products that we would run.</p> <p>5 Yeah, we have -- I mean, we could go on</p> <p>6 forever on this. We have reach and</p> <p>7 frequency as a tool you could use to reach</p> <p>8 people. We have different optimizations</p> <p>9 that allow bid to bid on different</p> <p>10 outcomes within our system.</p> <p>11 Q. And can you briefly explain,</p> <p>12 what are dynamic ads?</p> <p>13 A. Dynamic ads are catalog-based</p> <p>14 ads. So dynamic ads would be a solution</p> <p>15 where an ad is served with a carousel of</p> <p>16 different products and the consumer would</p> <p>17 hopefully be attracted to one of those</p> <p>18 products within that carousel.</p> <p>19 Q. Okay.</p> <p>20 Have you ever heard of the term</p> <p>21 "native ads"?</p> <p>22 A. Yes.</p> <p>23 Q. What's your understanding of</p> <p>24 that term?</p> <p>25 A. I'm assuming that -- again, I'm</p>	<p style="text-align: right;">Page 21</p> <p>1 S. Whitcombe</p> <p>2 A. Would be ads that are served on</p> <p>3 properties that are owned by the company</p> <p>4 that is selling them, owned and operated</p> <p>5 by the company that's selling them.</p> <p>6 Q. So with that -- with that</p> <p>7 definition, does Meta have owned and</p> <p>8 operated properties on which it sells</p> <p>9 advertising spaces?</p> <p>10 A. Yes.</p> <p>11 Q. Which ones would those be?</p> <p>12 A. The ones that we've already</p> <p>13 discussed. It would be Facebook,</p> <p>14 Instagram, and it would be click to</p> <p>15 Messenger ads on WhatsApp and Messenger.</p> <p>16 Q. Okay.</p> <p>17 So when we use the term "owned</p> <p>18 and operated properties" during this</p> <p>19 deposition today, we'll be referring to</p> <p>20 Facebook or Instagram app or web and</p> <p>21 Messenger click --</p> <p>22 A. Click to Messenger.</p> <p>23 Q. -- properties.</p> <p>24 Does that sound good?</p> <p>25 A. Yeah, it sounds good.</p>

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

CERTIFICATION BY REPORTER

I, Wayne Hock, a Notary Public of the
State of New York, do hereby certify:
That the testimony in the within
proceeding was held before me at the
aforesaid time and place;
That said witness was duly sworn
before the commencement of the testimony,
and that the testimony was taken
stenographically by me, then transcribed
under my supervision, and that the within
transcript is a true record of the
testimony of said witness.
I further certify that I am not
related to any of the parties to this
action by blood or marriage, that I am not
interested directly or indirectly in the
matter in controversy, nor am I in the
employ of any of the counsel.
IN WITNESS WHEREOF, I have hereunto
set my hand this 29th day of September, 2023.



wayne hock